Worksheet
Determination of NEPA Adequacy (DNA)
U.S. Department of the Interior
Bureau of Land Management

OFFICE: Winnemucca District Office

TRACKING NUMBER: DOI-BLM-NV-W010-2014-0020-DNA

CASEFILE/PROJECT NUMBER: N-46997

PROPOSED ACTION TITLE/TYPE: Star Peak Repeater

LOCATION/LEGAL DESCRIPTION: Star Peak on the Humboldt Range, Pershing County, NV: T.31 N., R.34 E., sec. 28 SWSW

APPLICANT (if any): BLM

A. Description of the Proposed Action with attached map(s) and any applicable mitigation measures.

Purpose and Need

The purpose of this federal action is to allow the Bureau of Land Management (BLM) access to establish a repeater communication site to improve the communication network within the Winnemucca District. The need for the action is established by BLM's responsibility under the Federal Land Policy and Management Act of 1976 (FLPMA) (Section 501(5)), and BLM regulations at 43 Code of Federal (CFR) 2800, to process ROW applications. FLPMA Section 507 allows rights-of-way to be provided to any department or agency of the United States.

Proposed Action

The BLM requests a right-of-way for the establishment of a repeater on public lands within T.31N., R.34E., section 28 within the county of Pershing, Nevada (see location maps attached). The proposed action would be located at N40°31'20.50; W118°10'15.29"on Star Peak in the Humboldt Range and would occur within a 40 x 40 ft. area within the parcel in public ownership described above.

A current active repeater is also located on Star Peak within T.31N., R.34E., section 28, but sits just below the peak in the saddle and to the north of the proposed action location. Since 2002 the signal to the southwest from the repeater has been unable to service Lovelock and surrounding area. This is a safety, as well operational, concern as this limits contact with the Lovelock Fire Station for dispatching personnel to reported fires. Hence, a different repeater location is required to improve this corridor of

communication, as well as maintain the current levels of communication. The proposed action is the only option that satisfies this requirement. Establishing a repeater on the top of Star Peak would open up communication and improve employee and public safety as well as improve natural resource protection.

The repeater structure is a Pepro cabinet – a freestanding, solar powered, self-contained apparatus that does not require intentional ground disturbance. It weighs approximately 650 lbs. with dimensions 38" W x 45" D x 67" H. It is anchored by four concrete base pads that rest on the ground, weighted in place; no excavation is necessary. The cabinet and base pads are removable and no permanent structures would be installed. The antenna tower is a 20-foot monopole that extends directly from the cabinet. The proposed action is within 100 feet of an existing two-track road. The cabinet would be trailered up on existing roads using an ATV; jacks would be used to remove, level, and orient the structure.

The repeater would be placed between the months of May 1 – August 9, 2014. It would take 1-5 days to establish the repeater. Maintenance activities would occur 0-2 times/year.

B. Land Use Plan (LUP) Conformance

LUP Name: Sonoma – Gerlach Management Framework Plan, Date Approved: 7/9/1982

The proposed action in is conformance with the LUP, even though it is not specifically provided for, because it is consistent with the following LUP decisions (objective, terms, and conditions):

> OBJECTIVE: District Manager's Decision L. 4.2 – Develop new communication sites only when environmental or technical problems on an existing site are incompatible with new applications. New site development and road construction will be permitted only when no feasible alternative can be used on the following mountain ranges: Humboldt Range, (11 other ranges listed in MFP).

C. Identify applicable National Environmental Policy Act (NEPA) documents and other related documents that cover the proposed action.

List by name, number and date (DR/FONSI or ROD) all applicable NEPA documents that cover the proposed action.

EA #: NV-020-07-EA-15
Title: Sonoma Peak Repeater Site
Decision Date: July 2007

List by name and date other documentation relevant to the proposed action (e.g., biological assessment, biological opinion, watershed assessment, allotment evaluation, and monitoring report).

Proposed Activities in Greater Sage-Grouse Preliminary Habitat Areas Form, submitted to BLM Nevada State Office 4/21/2014.

D. NEPA Adequacy Criteria

1. Is the new proposed action a feature of, or essentially similar to, an alternative analyzed in the existing NEPA documents(s)? Is the project within the same analysis area, or if the project location is different, are the geographic and resource conditions sufficiently similar to those analyzed in the existing NEPA document(s)? If there are differences, can you explain why they are not substantial?

The new proposed action is essentially similar to the proposed action in the Sonoma Repeater Site EA (NV-020-07-EA-15). The Sonoma Peak Repeater Site EA analyzed a proposal to construct a repeater site within the Sonoma Range at T. 35 N., R. 39 E., section 20, SW1/4SW1/4. The footprint was a 100 x 100 ft. (0.23 acre) area, and the repeater was constructed following standard radio designs for narrowband established by the National Information Resources Management Center. This consisted of two concrete pads which served as foundations for a radio transmitter building and an antenna tower measuring 50 ft. in height. Access for installation and maintenance occurred on existing roads.

The Star Peak Repeater proposed action is within a different analysis area; however the resource conditions are sufficiently similar to those analyzed in the Sonoma Peak Repeater Site EA.

Soils and Vegetation

Soils information is extracted from the Soils Survey of Humboldt County, Nevada, East Part I. The proposal is located on a rock outcrop inclusion of the Westbutte stony loam soil map unit. Rock outcrops limit the extent of perennial vegetation which would otherwise be represented by mountain brome, needlegrass and mountain sagebrush. Soil characteristics as far as wind and water erosion potential would be essentially similar to those analysed in the Sonoma Peak Repeater Site EA, 2007. Vegetation impacts would be minimal, essentially the same as analyzed in the Sonoma Peak Repeater Site EA, 2007.

Wildlife Habitat

Table 1 shows the breakdown of habitat types found within a 3.2 mile buffer of the proposed site. This is the recommended buffer distance for avoiding noise disturbance around Sage-grouse leks. Approximately 17% of the area is made up of habitat preferred by Sage-grouse including various sagebrush habitat types and riparian woodlands and shrublands (Table 1). NDOW classifies the area as crucial summer habitat for mule deer and potential big horn sheep habitat. The area also contains habitat for a variety of sensitive and non-sensitive migratory birds and raptors including golden eagles, northern

goshawks, and prairie falcons. In addition, the area contains suitable bat foraging, maternity, and hibernacula habitat and several abandon mines within 3 miles of the proposed site. Finally, the Nevada Natural Heritage Program (NNHP) database shows a high likelihood of several BLM sensitive plant species in the area.

Table 1. Vegetation composition within 3.2 miles of the proposed site of the Star Peak repeater.

Vegetation Type	Acreage	Proportion
Great Basin Foothill and Lower Montane Riparian Woodland and Shrubland	173.7	0.79
Great Basin Pinyon-Juniper Woodland	13766.63	62.88
Great Basin Xeric Mixed Sagebrush Shrubland	2216.62	10.12
Inter-Mountain Basins Big Sagebrush Shrubland	708.79	3.24
Inter-Mountain Basins Cliff and Canyon	2561.71	11.7
Inter-Mountain Basins Mixed Salt Desert Scrub	73.97	0.34
Inter-Mountain Basins Montane Sagebrush Steppe	226.2	1.03
Inter-Mountain Basins Semi-Desert Grassland	170.49	0.78
Inter-Mountain Basins Semi-Desert Shrub Steppe	95.49	0.44
Inter-Mountain Basins Subalpine Limber-Bristlecone Pine Woodland	553.32	2.53
Invasive Annual Grassland	1324.59	6.05
Recently Burned	23.66	0.11

2. Is the range of alternatives analyzed in the existing NEPA documents(s) appropriate with respect to the new proposed action, given current environmental concerns, interests, and resource values?

The range of alternatives analyzed in the Sonoma Peak Repeater Site EA (NV-020-07-EA-15) include the proposed action and a no action alternative. Alternatives considered but eliminated from detailed analysis were described as locating the repeater on other mountain ranges. The reason these alternatives were eliminated was because they did not meet the need of the project. Similarly, establishing the Star Peak repeater on a different mountain range would be a possible alternative, but it would not meet the purpose and need of the action as described in Section A above.

The no action alternative would also be considered as a possible alternative for the Star Peak repeater.

3. Is the existing analysis valid in light of any new information or circumstances (such as, rangeland health standard assessment, recent endangered species listings, updated lists of BLM-sensitive species)? Can you reasonably conclude that new information and new circumstances would not substantially change the analysis of the new proposed action?

Recent BLM NV State Office guidance (IM-NV-2011-044) related to Greater Sage Grouse has designated specific habitat in Nevada as Preliminary Priority Habitat (PPH) and Preliminary General Habitat (PGH) if it meets specified criteria for breeding habitat. Any project that falls within PPH or PGH must include additional correspondence and evaluation steps, including coordination and review by the Nevada Department of Wildlife (NDOW). The Star Peak Repeater falls on the edge of PGH; correspondence with the NV State Office and NDOW was initiated and the proposed action was reviewed and approved by NDOW and BLM Wildlife Biologists (April 3, 2014; see attached). Based on this process, we can reasonably conclude that the recent Greater Sage Grouse guidance would not substantially change the analysis of this proposed action.

In March of 2012 the BLM issued new guidance related to Lands with Wilderness Characteristics. Manual 6310 provides the circumstances when BLM should consider updating wilderness characteristics inventory. Where a project may impact wilderness characteristics is undergoing NEPA analysis is one of those circumstances. Because the Sonoma Repeater EA was completed prior to the issuance of this guidance, this resource was not addressed. The initial wilderness characteristic inventory (1979) was reviewed for the Star Peak unit (NV-020-421). At that time several comments were received; some noting the area had numerous roads or intrusions while others identifying the area as having wilderness characteristics. The BLM determined that the area lacked wilderness characteristics and the unit was dropped from further wilderness consideration. Current reviews of the project area concurs that the project area does not meet the criteria for lands with wilderness characteristics, therefore no further analysis is needed.

4. Are the direct, indirect, and cumulative effects that would result from implementation of the new proposed action similar (both quantitatively and qualitatively) to those analyzed in the existing NEPA document?

The Star Peak Repeater proposed action would be smaller in context and intensity than the proposed action analyzed in the Sonoma Peak Repeater Site EA (NV-020-07-EA-15). The latter project was within a 100 x 100 ft. footprint and the former would be within a 40 x 40 ft. footprint. The Sonoma Peak Repeater Site EA evaluated the effects of the construction of two concrete foundations for a transmitter building and 50 ft. antenna tower. The Star Peak Repeater proposed action consists of placing one removable Pepro cabinet with a 20 ft. monopole.

Using the analysis from the Sonoma Peak Repeater Site EA, the following resources were evaluated for direct, indirect, and cumulative effects regarding the Star Peak Repeater proposed action:

Cultural Resources
There will be no cultural impacts by this action. SHPO concurred April 7, 2014.

Native American Religious Concerns
Consultation was done in the original EA. Since this is a minor change in location, further consultation is not necessary.

Visual Resource Management

The proposed project is in area identified as a VRM Class IV. H-8431-1 – Visual Resource Contrast Rating Describes the management objective for Class IV as: ". . . is to provide for management activities which require major modification of the existing landscape. The level of change to the characteristic landscape can be high. The management activities may dominate the view and be the major focus of viewer attention. However, every attempt should be made to minimize the impact of these activities through careful location, minimal disturbance, and repeating the basic elements.

Soils and Vegetation

Vegetation impacts would be minimal, essentially the same as analyzed in the Sonoma Peak Repeater Site EA, 2007.

Special Status Species

According the Southwest Regional GAP map, the exact location of the repeater is in a Xeric Mixed Sagebrush Shrubland community surrounded by a large Subalpine Limber-Bristlecone Pine community. The area is adjacent to and contiguous with known Sage-grouse nesting, winter, and summer habitat and includes large amounts of PGH. Sage-grouse move between seasonal habitat ranges and flights may exceed 75 km (Connely et al. 20000). One known lek occurs within five miles, two additional leks within 10 miles, and approximately 17 leks within easy flight distance for sage-grouse. Over the last 10-12 years, several large fires have occurred throughout the surrounding area and may have driven more Sage-grouse into the area.

Several studies show that tall structures (i.e., the repeater itself) provide perch sites for Sage-grouse predators such as Corvids and raptors (Pruett et al. 2009, Gillan et al. 2013). Sage-grouse avoid such structures which serve as barriers for sage-grouse movement and dispersal, thereby increasing fragmentation in an already fragmented landscape (Pruett et al. 2009, Gillan et al. 2013).

The area contains several abandon mines within 3 miles of the proposed site and several sensitive bat species have been documented in the area (Table 2). Bats commonly roost in caves, mines, outcrops, buildings, trees, and under bridges. Persistent and casual human disturbance at maternity or hibernacula sites are known to cause bat population declines through elevated mortality rates, poor recruitment, and colony abandonment (Martin et al. 2000).

Table 2. Special status bats with the potential to occur within 4 miles of the proposed location for the Star Peak repeater.

Common Name	Scientific Name	Common Name	Scientific Name
Townsend's big-eared bat	*Corynorhinus townsendii*	Western small-footed bat	*Myotis ciliolabrum*
Big brown bat	*Eptesicus fuscus*	Pallid bat	*Antrozous pallidus*
Long-legged myotis	*Myotis volans*		

In the Great Basin, pygmy rabbit burrows are typically found under taller and denser big sagebrush and occur in areas with loamy soils deeper than 20 inches and with 13-30% clay content. Pygmy rabbits use various subspecies of sagebrush and other shrub species may be present including bitterbrush, rabbitbrush, snowberry, juniper, and greasewood. At the landscape scale, preferred locations for burrows include broad valley floors, drainage bottoms, alluvial fans, and other areas with friable soils. A dietary study of pygmy rabbits showed dependence on sagebrush year round and sagebrush made up about 51% of the diet in summer and 99% in the winter (Green and Flinders 1980). Thus, the nearby area contains potential pygmy rabbit habitat (e.g., preferred clay content and vegetation types). These factors suggest that surveys be conducted prior to installation and avoidance measures be considered during operations.

Table 3 shows six BLM sensitive plant species that may be encountered in the project area. Several of these species are associated with habitat found in the area such as steep slopes (Bruneau River Prickly Phlox), barren soil terraces (Obscure Scorpion Flower), roadsides and washes (Lahontan Beardtongue), high elevation dry and exposed areas (Windloving Buckwheat), scree and talus slopes (Goodrich Biscuitroot), and various rock types (Holmgren Smelowskia). These factors suggest that surveys be conducted prior to installation and avoidance measures be considered during operations.

Table 3. Special status plants with the potential to occur in and around the proposed location for the Star Peak repeater.

Common Name	Scientific Name	Common Name	Scientific Name
Obscure Scorpion Flower	*Phacelia inconspicua*	Goodrich Biscuitroot	*Cymopterus goodrichii*
Lahontan Beardtongue	*Penstemon palmeri*	Holmgren Smelowskia	*Smelowskia holmgrenii*
Windloving Buckwheat	*Eriogonum anemophilum*	Bruneau River Prickly Phlox	*Leptodactylon glabrum*

Migratory Birds

The area also contains habitat for a variety of sensitive migratory birds and raptors including golden eagles, northern goshawks, and prairie falcons. Several nests for these raptors have been documented within 5 miles of the proposed location. If disturbed at crucial times during the nesting season (e.g., during nest building and incubation), raptors are susceptible to nest abandonment (Call 1978, Steenhof and Kochert 1982, Watson 1993). In addition, the installation requirements may be detrimental to certain migratory birds through direct impacts such as trampling the eggs of ground nesters. Therefore, installation and construction activities should happen outside the March 1– August 31 nesting season for migratory birds and raptors. Pre-construction survey would be completed prior to installation.

Wildlife

Some of the large mammal species that may be encountered would include mule deer (*Odocoileus hemionus*), pronghorn (*Antilocapra americana*), mountain lion (*Felis concolor),* bobcat (*Lynx rufus),* black-tailed jackrabbit (*Lepus californicus*), coyote (*Canis latrans*), and badger (*Taxidea taxus*). NDOW classifies the area as crucial summer habitat for mule deer and potential big horn sheep habitat. The proposed action requires no new roads and is not expected to interfere with the life cycle requirements of mule deer, big horn sheep, or other general wildlife species.

5. Are the public involvement and interagency review associated with existing NEPA document(s) adequate for the current proposed action?

Regarding the Sonoma Peak Repeater EA (NV-020-07-EA-15), a scoping letter was sent to interested parties, and state and local governments. A total of five responses were received during the 30-day public commenting period. The issues identified during the scoping process have also been considered for the Star Peak Repeater proposed action. Regarding the Sonoma Peak Repeater, consultation and coordination occurred with the Winnemucca Indian Colony, a professional botanist, Director of Utah BLM State Telecommunications, BLM National Interagency Fire Center, and the Humboldt County Communications Department.

Based on the measures taken in the Sonoma Peak Repeater EA, the public involvement and interagency review were adequate for the Star Peak Repeater proposed action.

E. Persons/Agencies/BLM Staff Consulted

Name /Title	Resource/Agency Represented	Signature/Date	Comments (Attach if more room is needed)
Pat Haynal	Cultural Resources	S\P. Haynal	
Pat Haynal	Palaeontology	S\P. Haynal	
Mark Hall	Native American Religious Concerns	S\Mark E. Hall 5\20\14	
V. Joey Carmosino	Visual Resource Management	S\VJ Carmosino 5/13/2014	
Derek Messmer	Fire Management	S\D Messmer 5/15/14	
Eric Baxter	Invasive, Non-native species	S\Eric Baxter 5/13/2014	
Rob Burton	Soils and Vegetation		
Jon McCloskey	Threatened & Endangers species	S\Jon McCloskey 5\13\14	
Jon McCloskey	Special Status Species	S\Jon McCloskey 5\13\14	
Jon McCloskey	General Wildlife Habitat	S\Jon McCloskey 5\13\14	
Zwaantje Rorex	Lands with Wilderness Characteristics	S\Zwaantje Rorex 5\13\14	
Robert Bunkall	GIS	S\Robert Bunkall 5\13\14	

Note: Refer to the EA/EIS for a complete list of the team members participating in the preparation of the original environmental analysis or planning documents.

[x] **Conclusion** *(If you found that one or more of these criteria is not met, you will not be able to check this box.)*

Based on the review documented above, I conclude that this proposal conforms to the applicable land use plan and that the NEPA documentation fully covers the proposed action and constitutes BLM' compliance with the requirements of the NEPA.

____S_Derek Messmer_____5\15\14_____
Signature of Project Lead

___S\Mark E. Hall 5\20\14_____
Signature of NEPA Coordinator

___S\Victor W Lozano _____ 5\22\14
Signature of the Responsible Official Date

Note: The signed Conclusion on this Worksheet is part of an interim step in the BLM's internal decision process and does not constitute an appealable decision. However, the lease, permit, or other authorization based on this DNA is subject to protest or appeal under 43 CFR Part 4 and the program-specific regulations.